

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP
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October 3, 2019

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
 Remedial Project Manager
 Institutional Controls Coordinator
 U.S. Environmental Protection Agency Region 5
 77 West Jackson Boulevard (SR-6J)
 Chicago, IL 60604

Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 55 (July-September 2019)

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from July-September 2019.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **Institutional Controls:** During the July-September 2019 period, the Group prepared draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties. The draft notices were submitted to EPA on September 17, 2019.
- **Groundwater Monitoring:** On September 4, 2019, the Group's consultant, Environmental Works, Inc. (“EWI”), abandoned damaged monitoring well MW-105S at the main industrial site. On September 26, 2019, EWI constructed concrete bollards around monitoring well MW-105D to protect the well from vehicle traffic. EWI initiated efforts to prepare a well abandonment report.
- **Operation and Maintenance:** During the July-September 2019 period, the following operation and maintenance activities were performed at the site:

August 6– August 8	The Group's contractor, Munie Greencare Professionals (“Munie”), cut the vegetation on the 1555 State Street property.
August 30	The Group’s project coordinator sent an email to the owner/operator of All Pallet Services to determine the status of his efforts to repair the bent fence pole, broken fence post, and barbed wire, and collect litter attributable to All Pallet Services’ operation along the southern side of the Taracorp pile.

August 31	Received an acknowledgement from the owner/operator of All Pallet Services that his personnel were scheduled to address the fence repairs.
September 19	Munie cut the vegetation on the 1555 State Street property.
September 20	Sent a follow-up email to the owner/operator of All Pallet Services to attempt to confirm that fence repairs had been completed.

- **Project Coordination:** During the July-September 2019 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

July 1	Submitted Quarterly Progress Report 54 to EPA.
July 1	Sent an email to EPA's project manager to acknowledge receipt of EPA's draft approval letter with modifications of the Group's plans to abandon damaged monitoring well MW-105S at the main industrial site.
July 9	Sent a letter to EPA on the Group's behalf to respond to EPA's approval letter with modifications of the Group's plans to abandon damaged monitoring well MW-105S at the main industrial site.
July 9	Sent a letter to authorize the Group's consultant, EWI, to abandon damaged monitoring well MW-105S at the main industrial site.
August 13	Sent an email and letter to EPA to provide EWI's updated certificate of liability insurance related to EWI's work at the site.
August 14	Spoke to an environmental consultant from St. Louis in regard to her efforts to perform Phase 1 environmental site assessments for the 1560 State Street and 1510 Grand Avenue properties in Granite City.
August 20	Sent an email to notify EPA and Illinois EPA that EWI plans to abandon damaged monitoring well MW-105S at the site on September 4, 2019.
August 20	Sent an email to notify the property owner's representative that EWI plans to abandon damaged monitoring well MW-105S at the site on September 4, 2019.
August 30	Sent an email to the owner/operator of All Pallet Services to determine the status of his efforts to repair the bent fence pole, broken fence post, and barbed wire attributable to All Pallet Services' operation along the southern side of the Taracorp pile.
August 31	Received an acknowledgement from the owner/operator of All Pallet Services that his personnel were scheduled to address the fence repairs.
September 3	Sent an email to EPA and Illinois EPA to provide the name of EWI's field manager for well abandonment work on September 4.
September 13	Received an email from EPA's project manager regarding a conference call and site visit.
September 16	Communicated with EPA regarding schedule options for a conference call and site visit.
September 17	Sent emails to EPA to provide draft notices of potential soil contamination for 12 denied access properties and draft notices of soil contamination for 3 denied access properties.

September 19	Notified Mayco Industries' representative of the Group's plans to install concrete bollards around monitoring well MW-105D on September 26, 2019.
September 20	Sent a letter on the Group's behalf to authorize EWI to install concrete bollards around monitoring well MW-105D.
September 20	Sent a follow-up email to the owner/operator of All Pallet Services to attempt to confirm that fence repairs had been completed.
September 21	Sent an email to notify EPA and Illinois EPA that EWI plans to install concrete bollards around monitoring well MW-105D on September 26, 2019.

2. Summary of Data and/or Results of Sampling and Tests Received:

- Not applicable for this reporting period.

3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:

- Not applicable during this reporting period.

4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:

- The Group's representatives will participate in a conference call with EPA and Illinois EPA on October 11, 2019 and a site visit on November 13, 2019.
- The Group's representatives will continue to perform operation and maintenance activities at the site, as required. As part of the Group's operation and maintenance activities, the Group's project coordinator will perform an operation and maintenance inspection and provide a report to EPA.
- The Group's consultant, EWI, will continue to prepare a report to document the abandonment of monitoring well MW-105S. The report will be submitted to EPA upon completion.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.
- The Group will address comments, if any are received, on the draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019.
- The Group will address EPA's comments, if any are received, on the revised draft environmental covenants submitted to EPA and Illinois EPA in May 2019.

- The Group will address EPA's comments, if any are received, on the draft administrative records and supporting documents for the 15 denied access residential properties, which were submitted to EPA in March 2019.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive Non-Responsive, and Non-Responsive in June 2015 and one residential property (Non-Responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive and Non-Responsive) in August 2016.

5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019. This area will be examined with EPA and Illinois EPA during the November 2019 site visit.

6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:

- Not applicable for this reporting period.

7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:

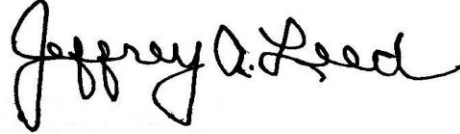
- Not applicable for this reporting period.

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October 3, 2019
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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

A handwritten signature in black ink that reads "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent and the last name "Leed" following in a similar style.

Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)